

**EXHIBIT A:**  
**STIPULATED FACTS**

JUL 11 2011

AT GREENBELT  
CLERK U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

*The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.*

At all times relevant to this case, defendant **JONATHAN ANGIER** was a resident of Silver Spring, Maryland. In 2005, Inspectors for the United States Postal Inspection Service identified a commercial child pornography website and subsequently arrested the website owner. The USPIS identified approximately 542 individuals that had communicated with the website owner in regards to the purchase of videos. **ANGIER** was among the individuals who had communicated with and ordered child pornography from the website owner. In March 2006, **ANGIER** ordered 34 videos from the owner of the website, 22 of which depicted children engaged in sexually explicit conduct.

On August 13, 2009, the USPIS emailed all individuals who had previously ordered videos through the website. The email advertised a new catalog offering new videos to those interested. On August 21, 2009, **ANGIER** responded to the email stating, "Hi, I am a former customer. I received your email regarding your new movies. Please send me a catalog- I am very interested. Discretion will of course be exercised. I can pay by check or money order. Thank you, Jonathan Angier." On August 22, 2009, the USPIS emailed **ANGIER** a catalog describing 14 videos depicting children engaged in sexually explicit conduct. On August 22, 2009, **ANGIER** responded by ordering 11 of the videos. The following videos, among others, were described as follows and ordered by **ANGIER**:

CDMC-1933: Petite little dark eyed girl about nine years old explores her love channel, bent over, front and back. Great double penetration shots with vibrators.

CDMC-2167: Right from the get-go this long haired 7 year old beauty is deflowered by an adult male. She learns to pleasure him orally.

CDMC-1721: See close-ups as an eight year old in the bathtub; 10-year-old girl and man pee on each other, same for 11-year-old boy and girl. The 10 year old girl pleasures herself, and then enjoys full sexual pleasures with an adult male.

On August 24, 2009, **ANGIER** provided \$180 in U.S. currency to the USPIS' undercover address. **ANGIER** provided his home address in Silver Spring, Maryland as the location where the videos were to be shipped. Inspectors traced the email address used to communicate with the USPIS, jonathanangier@yahoo.com, which resolved to the residence of **ANGIER**.

On September 23, 2009, Inspectors executed a federal search warrant at **ANGIER**'s residence. During the search, agents interviewed **ANGIER**, who confirmed his email and

acknowledge that he made purchases from online websites. Agents also seized digital media, including a personal computer.

Forensic analysis of **ANGIER's** computer revealed over 2,800 images and 175 video files and clips depicting children engaged in sexually explicit conduct, including images of prepubescent minors who had not attained the age of 12 years.

One of the videos ordered and received by **ANGIER** in September of 2009, titled "Children's Sex Orgy" is a compilation video depicting multiple pubescent male and female children engaging in oral and vaginal intercourse.

Pursuant to identification by the National Center for Missing and Exploited Children, numerous images were identified as depicting known victims and therefore depict actual minors engaged in sexually explicit conduct. These victims did not reside in nor were the images produced in Maryland; the images therefore traveled in interstate and foreign commerce.

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

7/11/11  
Date

  
Jonathan Angier

I am Jonathan Angier's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is a voluntary one.

07/11/11  
Date

  
William C. Brennan, Jr., Esquire